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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
MARIO DAVID SANCHEZ,)
)
)
Defendant.)

2:15-CR-00213-JAD-NJK

**STIPULATION TO CONTINUE
SENTENCING AND DISPOSITION
FOR MARIO D. SANCHEZ**

IT IS HEREBY STIPULATED AND AGREED by and between Defendant, MARIO DAVID SANCHEZ, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the United States of America, by its counsel, SUSAN CUSHMAN, Assistant U.S. Attorney, that the trial in the above-captioned matter currently set for Monday June 5, 2017 at 9:00a.m. be vacated and continued to at least 60 days to a time after August 28, 2017 at a time convenient for the court.

This Stipulation is entered into for the following reasons

1. Mr. Leventhal will be out of jurisdiction and will not be available.
2. Mr. Leventhal will commence the U.S. v. Bundy et al., matter in July and is expected to be in Trial for 6-8 weeks.
3. Mr. Sanchez is not in custody and agrees with the requested continuance.
4. Mr Leventhal has spoken to Susan Cushman, Assistant United States Attorney, and she has no objection to this continuance.

1 5. Additionally, denial of this request for a continuance could result in a miscarriage
2 of justice.

3
4 DATED this 2nd day of June, 2017.

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6 /s/ Todd M. Leventhal
7 TODD M. LEVENTHAL, ESQ.
8 Counsel for Mario David Sanchez

/s/ Susan Cushman
 SUSAN CUSHMAN
 Assistant U.S. Attorney

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11 Submitted By: LEVENTHAL & ASSOCIATES, PLLC

12
13 By: /s/ Todd M. Leventhal
14 TODD M. LEVENTHAL, ESQ.
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6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) 2:15-cr-00213-JAD-NJK
12 vs.)
13 MARIO DAVID SANCHEZ)
14 Defendant.)
15

16
17 **FINDINGS OF FACT**

18 Based on the stipulation of counsel, and good cause appearing, the Court finds that:

- 19 1. Mr. Leventhal will be out of jurisdiction and will not be available.
20 2. Mr. Leventhal will commence the U.S. v. Bundy et al., matter in July and is
21 expected to be in Trial for 6-8 weeks.
22 3. Mr. Sanchez is not in custody and agrees with the requested continuance.
23 4. Mr Leventhal has spoken to Susan Cushman, Assistant United States Attorney, and
24 she has no objection to this continuance.
25 5. Additionally, denial of this request for a continuance could result in a miscarriage
26 of justice.

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1 **CONCLUSIONS OF LAW**

- 2 1. For all the above-stated reasons, the ends of justice would be best served by granting
3 a continuance of the current Sentencing and Disposition Hearing and reset it for a
4 time after August 28, 2017 at a time convenient for the court.
5

6 **ORDER**

7 Accordingly, IT IS SO ORDERED that the current Sentencing and Disposition is
8 vacated and the same is continued and reset for September 5, 2017, at the hour of 9:00 a.m.,
9 in Courtroom 6D.

10 DATED this 2nd day of June, 2017.

11 
12 JENNIFER A. DORSEY
13 UNITED STATES DISTRICT JUDGE

14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on the 2nd day of June, 2017 a true and correct copy of the,

16 **STIPULATION AND ORDER TO CONTINUE TIME FOR SENTENCING AND**

17 **DISPOSITION** was filed through the CM/ECF filing system and was electronically served to

18 the following registered addresses on file for this instant case :

19 Kevin R Stolworthy: kstolworthy@armstrongteasdale.com, cflynn@armstrongteasdale.com,

20 sdarling@armstrongteasdale.com
21

22 Susan Cushman: susan.cushman@usdoj.gov, Christie.M.Sequeira@usdoj.gov,

23 USANV.team3@usdoj.gov, caseview.ecf@usdoj.gov, denise.cope@usdoj.gov
24

25
26 /s/ Todd M. Leventhal

27 An Employee of TODD M. LEVENTHAL, ESQ.
28 LEVENTHAL AND ASSOCIATES, PLLC.